

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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| In re: | : : |
| THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, | : PROMESA : Title III : : |
| as representative of | : Case No. 17-BK-3283 (LTS) : : |
| THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> , | : (Jointly Administered) : : |
| Debtors. ¹ | : : |
| | ----- X |
| In re: | : : : |
| THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, | : PROMESA : Title III : : |
| as representative of | : Case No. 17-BK-3567 (LTS) : : |
| PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, | : : : |
| Debtor. | : : : |
| | ----- X |

**INFORMATIVE MOTION OF THE AVOIDANCE ACTIONS TRUSTEE REGARDING
HEARING ON CONFIRMATION OF HTA PLAN OF ADJUSTMENT
AND AUGUST 17-18, 2022, OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233 (LTS)) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Drivetrain, LLC (“Drivetrain” or the “Trustee”), in its capacity as the trustee of the Commonwealth Avoidance Actions Trust (the “Trust”) hereby submits this informative motion in response to the Court’s *Order Regarding Procedures for Hearing on Confirmation of HTA Plan Of Adjustment and August 17-18, 2022, Omnibus Hearing* [Case No. 17-3283, Docket No. 21494] (the “Scheduling Order”) and respectfully states as follows:

1. Nicholas A. Bassett of Paul Hastings LLP will appear on behalf of the Trustee at the Hearing (as defined in the Scheduling Order), and reserves the right to address, as necessary, the following matters:
 - (a) *Third Amended Title III Plan of Adjustment of the Puerto Rico Highways and Transportation Authority* [Case No. 17-3283, Docket No. 21271, Case No. 17-3567, Docket No. 1242];
 - (b) *Status Report to be filed by the Oversight Board;*
 - (c) *Status Report to be filed by AAFAF;*
 - (d) Any objections, responses, statements, joinders, or replies to any of the foregoing; and
 - (e) Any statements made by any party in connection with the Title III cases or any adversary proceeding pending therein.
2. In addition, Mr. Juan J. Casillas Ayala of Casillas, Santiago & Torres LLC and one of his co-counsel will also be attending, on behalf of the Committee, the Hearing virtually.

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WHEREFORE, the Committee respectfully requests that the Court take notice of the above.

Dated: July 27, 2022

/s/ G. Alexander Bongartz

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*Counsel to Drivetrain, LLC, in its capacity as trustee
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- and -

/s/ Juan J. Casillas Ayala

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